

**EXHIBIT
No. 2**

Cates, Emily

From: Bellew, Sean [SBellew@cozen.com]
Sent: Tuesday, February 21, 2006 7:16 PM
To: Cates, Emily; Felice, David A.
Cc: Talbot, Cory; Papetti, Randy; Bowser, William; Patrick, SherryAnn; Berry, Kevin F.
Subject: RE: J-Squared v. Motorola - Draft of Motion to Compel

Emily -

Sorry for the delay in getting back to you. I was out for the holiday yesterday and am just getting a chance to respond to your e-mails.

We intend to file the Motion. These issues have been outstanding for some time now, and the courtesy of granting Motorola additional time to address them is likely to prejudice our clients -- which has been the case with previous courtesies. We will file the Motion, but we invite a response from Motorola to avoid the Court having to decide the Motion. If an agreement is reached after the Motion is filed, we can simply withdraw it at that point.

Feel free to call me if you would like to discuss.

From: Cates, Emily [mailto:ECates@lrlaw.com]
Sent: Tue 2/21/2006 7:33 PM
To: Felice, David A.; Bellew, Sean
Cc: Talbot, Cory; Papetti, Randy; Bowser, William; Patrick, SherryAnn
Subject: RE: J-Squared v. Motorola - Draft of Motion to Compel

Sean and David,

I haven't heard back from you in response to my e-mail below. As I indicated, Randy and Cory are out of the office most of the week.
Accordingly, we will get you our response on Friday. Thank you.

Emily

-----Original Message-----

From: Cates, Emily
Sent: Monday, February 20, 2006 4:15 PM
To: 'Felice, David A.'; Bellew, Sean
Cc: Talbot, Cory; Papetti, Randy; Bowser, William; Patrick, SherryAnn
Subject: RE: J-Squared v. Motorola - Draft of Motion to Compel

Sean and David,

We received your draft motion to compel. We are looking into the issues you raised and ask that you give us until Friday to respond, as Randy and Cory are out of the office most of the week. Let me know. Thank you.

Emily

-----Original Message-----

From: Felice, David A. [mailto:DFelice@cozen.com]
Sent: Friday, February 17, 2006 5:04 PM
To: Cates, Emily

Cc: Talbot, Cory; Papetti, Randy; Bowser, William; Bellew, Sean
Subject: J-Squared v. Motorola - Draft of Motion to Compel

Emily:

Pursuant to D. Del. LR 7.1, we are providing you with a draft copy of Plaintiffs' motion to compel. A final version of this motion may have revisions, but the requested documents and information should remain the same.

Please review this motion to determine whether Motorola will voluntarily produce the documents and/or information requested. Please provide me with your response by Wednesday at 4:00 pm EST. Thank you and have a good weekend.

David

David A. Felice
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